

FILE: PRODAOE BAY ALASKA
~~INTERFLOO PROJECT~~ increment
AND/SOHIO

Ray -
Please route to George
Brooks and Rob Wilson
and get their comments
by August 17.



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CC #12,630

August 3, 1979

Mr. Michael Johnston
U. S. Environmental Protection Agency
Region X
1200 Sixth Avenue
Seattle, Washington 98101

Dear Mr. Johnston:

A copy of the minutes of our July 12, 1979, meeting concerning Prevention of Significant Deterioration (PSD) applications is attached. I felt that you might want a copy of these minutes for your files and that this might be a good way to confirm our discussions. Unless I hear further from you, I will assume that you are in agreement with the conclusions reviewed in the minutes.

Sincerely,

Delfim Dias
Delfim Dias
Environmental Engineer

DD:sad

enclosure

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SOHIO PETROLEUM COMPANY

Division of Sohio Natural Resources Company

OFFICE CORRESPONDENCE

TO: Distribution

DATE: July 17, 1979

FROM: D. F. Dias

FILE NO: CC #12,614

SUBJECT: Meeting with USEPA Regarding PSD
Applications, July 12, 1979

YOUR REF:

Attendance:	D. F. Dias	SOHIO
	W. P. Metz	ARCO
	D. Cabe	Radian Corporation
	M. Haecker	Radian Corporation
	G. Brooks	USEPA, Region X
	M. Johnston	USEPA, Region X
	R. Nye	USEPA, Region X
	R. B. Wilson	USEPA, Region X

A meeting was held with the USEPA, Region X, July 12, 1979, to discuss the preparation of Prevention of Significant Deterioration (PSD) applications. The applications would be for Waterflood and non-Waterflood heaters and turbines required through 1985. The major points of the meeting were:

- 1) Since one year of monitoring data is not available, it must be shown to the agency's satisfaction that whatever monitoring data is submitted is representative of the period when the highest pollutant concentrations would be expected. Mr. Metz felt Alyeska had data showing May-June to be the months of highest ozone concentration.
- 2) It was suggested that the USEPA document AP-42 (an EPA listing of air pollutant emission factors) would be used for hydrocarbon emissions. AP-42 lists non-methane hydrocarbon emissions from natural gas fired turbines as 5-10% of the total hydrocarbon emission factor provided. Using AP-42, total non-methane hydrocarbon emissions would be less than 250 tons/year. Region X felt AP-42 could be in error and its use in this case (using 5-10% of the factor) would have to be substantiated. If we do model the standard non-reactive model is acceptable.
- 3) The applications must show that Good Engineering Practice stack heights are not exceeded in modeling.
- 4) The applications must show building downwash is not a problem for the proposed sources.
- 5) Region X felt the use of the Briggs Plume Rise is not appropriate for turbines. Region X felt 70% of Briggs should be used. Use of

100% of Briggs would require substantiation. It was agreed that if we were to use 70% of Briggs, and if after initial screening it showed no significant differences in ground level concentrations between 70% and 100% of Briggs, the full 100% of Briggs equation could be used.

- 6) Region X felt an Environmental Impact Statement (EIS) and PSD were independent and difficulties in one would not impede the other.
- 7) Region X felt we should show it is more conservative using Stability Class D vs. Stability Class E or F in modeling. It was the Unit representatives' feeling that we were using standard methods in calculating stability class and no additional proof of conservatism was required.
- 8) It was agreed that the proposed sources would be modeled alone to establish the area of significance. Then all sources would be modeled with receptors located only within this area of significance. Receptor spacing would be refined to 250 meters as the modeling progressed.
- 9) Background concentration will be from the upwind monitoring station.
- 10) Region X wished to know if the model would be calibrated using the two monitoring stations. It was decided that the model would not be calibrated.
- 11) Region X wished to know if short term NO_x .25 ppm for one hour would be modeled. Short term NO_x would not be modeled since there is no standard to model against.^x The Unit representatives understand that if PSD applications are not submitted prior to the proposed short term NO_x standard appearing in the Federal Register the applications may have^x to include short term NO_x modeling.
- 12) The Produced Water Injection Turbine problem was discussed. The USEPA, Region X, had no comment other than a PSD would take a minimum of five months to process.

Delfin Diaz